

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION

RightCHOICE Managed Care, Inc. et al.	)	
Plaintiffs,	)	Civil Action No:
v.	)	5:18-CV-06037-DGK
Hospital Partners, Inc. et al.	)	
Defendants	)	

MOTION OF KIRK AND DEBBIE HALL AND FLEMCO, LLC TO INTERVENE FOR  
PURPOSE OF RELIEF FROM THE PROTECTIVE ORDER HEREIN

Come now Kirk and Debbie Hall and FLEMCo LLC and move the Court for leave to intervene in this action for the limited purpose of obtaining relief from the protective order entered on January 23, 2019 (Doc 166). As more fully explained below, the ground for this motion is that counsel for Plaintiffs herein may have possession of documents produced by Defendants in this action that are relevant to another action pending in this court, *Kirk and Debbie Hall, et al. v. Health Acquisition Company LLC*, et al. (styled *James Shaffer et ux. et al. v. Health Acquisition Company et al.* as the original first-named Plaintiffs who are no longer parties), Case No. 4:18-cv-00601-NKL (the “HMC” case). Intervenors are the Plaintiffs in the HMC case. Counsel for Plaintiffs herein has advised undersigned counsel that he is precluded by the Protective Order from disclosing to undersigned counsel whether and to what extent Plaintiffs are in possession of any such documents or to provide them to the undersigned. As the accompanying suggestions should demonstrate, Plaintiffs in the HMC case have good cause to

determine whether Defendants have produced documents in this case that are relevant to the HMC case and have been unable to obtain such documents directly from Defendants Perez and EMPOWER HIS.

This motion is supported by the accompanying suggestions, which are incorporated herein by reference.

Respectfully submitted,

Wood Law Office LLC

By: /s/C. Brooks Wood  
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Attorney for HMC Plaintiffs/Intervenors

I certify that on this 7<sup>th</sup> day of February, 2020, I filed the foregoing document electronically with the Clerk of the Court by using the CM/ECF system, a true copy thereby to be furnished to all counsel of record, and served the same by email to counsel for certain defendants in the HMC case, Mr. Andrew Funk, and to Mr. Jorge Perez at [apbjap@gmail.com](mailto:apbjap@gmail.com).

/s/C. Brooks Wood